

EXHIBIT A

AFFIDAVIT OF SCOTT ESTEP

STATE OF WYOMING)
COUNTY OF Fremont) ss.:

SCOTT ESTEP, being sworn, states as follows:

1. I am of the age of majority and competent to testify to the matters contained herein.
2. I am the President of Wyoming Community Bank ("WCB") in Lander, Wyoming.
3. I have been provided with three documents ("WCB Statements") purporting to be WCB bank statements for January, February and March of 2021 in the name of Paul McCown for an account "ending in 3668." The WCB Statements accompany this affidavit as Exhibit A.
4. WCB Statements are not true and correct statements from WCB for the account ending in 3668 in Mr. McCown's name and appear to be forgeries.
5. The purported wire transfer into the account ending in 3668 on March 1, 2021, in the amount of \$750,000,000.00 as set forth in Exhibit A, is fictitious and never occurred. That transfer is not reflected in any record of WCB.
6. I have been provided with two documents, dated May 7, 2021 and May 11, 2021 respectively, purporting to be on WCB letterhead (the "Attestations"). The Attestations accompany this affidavit as Exhibit B.
7. The format of the letterhead on the Attestations does not reflect the true and correct letterhead for WCB, and the representation set forth in the Attestations is false, to my knowledge, and does not accurately reflect the bank's records.

8. To my knowledge, neither Paul McCown nor any entity he owns or controls has ever held hundreds of millions of dollars in an account or accounts at WCB as WCB would be unable to hold such large of deposits.

FURTHER AFFIANT SAYETH NOT.

DATED this 10 day of June, 2021.




Scott Estep

STATE OF WYOMING)
) ss.
COUNTY OF Fremont)

The foregoing *Affidavit of Scott Estep* was verified, subscribed, and sworn before me by *Scott Estep*, this 10 day of June, 2021.

Witness my hand and official seal.





Notary Public

My commission expires: 5-1-23

Exhibit A



Date 1/20/21 Page 1
 Primary Account Acct Ending 3668
 Enclosures

PAUL D MCCOWN
 10 RED RIM RD
 LANDER WY 82520

Account Title: PAUL D MCCOWN

Reward Checking		Number of Enclosures	0
Account Number	Acct Ending 3668	Statement Dates	12/17/20 thru 1/20/21
Previous Balance	666.54	Days in the statement period	35
2 Deposits/Credits	2,100.00	Average Ledger	567.92
26 Checks/Debits	2,444.76	Average Collected	567.92
Service Charge	.00	Interest Earned	.81
Interest Paid	.81	Annual Percentage Yield Earned	1.50%
Current Balance	322.59	2021 Interest Paid	.81

DEPOSITS AND ADDITIONS		
Date	Deposits	Amount
12/31	Transfer from x3957 to x3668	500.00
1/05	Transfer from x3957 to x3668	1,600.00
1/20	Interest Deposit	.81

WITHDRAWALS		
Date	Withdrawals	Amount
12/18	PAYMENT VENMO WEB	10.89-
12/21	POS DEB 2353 12/18/20 00000007 AMAZON.COM*PV3WA3T23 AMAZON.COM SEATTLE WA C#2629	23.09-
12/21	DBT CRD 1807 12/20/20 DJVZEUAB DISNEYPLUS 888-9057888 CA C#2629	6.99-
12/21	DBT CRD 1400 12/21/20 DJMS624N APPLE.COM/BILL 866-712-7753 CA C#2629	12.59-
12/24	DBT CRD 2007 12/24/20 DJJHHL2B APPLE.COM/BILL 866-712-7753 CA C#2629	2.99-
12/24	DBT CRD 2007 12/24/20 DJE6UFUU APPLE.COM/BILL 866-712-7753 CA C#2629	13.64-
12/28	PAYMENT VENMO WEB	75.00-



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Primary Account Acct Ending 3668
Enclosures

PAUL D MCCOWN
10 RED RIM RD
LANDER WY 82520

Reward Checking Acct Ending 3668 (Continued)

WITHDRAWALS		
Date	withdrawals	Amount
12/28	DBT CRD 0327 12/26/20 DJLQ0AQ1 APPLE.COM/BILL 866-712-7753 CA C#2629	2.99-
12/31	POS DEB 0740 12/31/20 00965801 AMAZON.COM*1G8N36M53 AMAZON.COM SEATTLE WA C#2629	9.74-
12/31	POS DEB 0740 12/31/20 00966687 AMAZON.COM*2W8R91NH2 AMAZON.COM SEATTLE WA C#2629	10.65-
12/31	POS DEB 0750 12/31/20 00979581 AMAZON.COM*0944085M3 AMAZON.COM SEATTLE WA C#2629	19.34-
12/31	POS DEB 1049 12/31/20 00233020 AMAZON.COM*Q54RX8AV3 AMAZON.COM SEATTLE WA C#2629	31.49-
12/31	POS DEB 0825 12/31/20 00012646 AMAZON.COM*OY27W2D73 AMAZON.COM SEATTLE WA C#2629	53.24-
12/31	POS DEB 0740 12/31/20 00971145 AMAZON.COM*WT8HC9013 AMAZON.COM SEATTLE WA C#2629	129.30-
1/04	POS DEB 1211 12/31/20 00374130 AMAZON.COM*XU7L890H3 AMAZON.COM SEATTLE WA C#2629	20.97-
1/04	POS DEB 1206 12/31/20 00000002 AMAZON.COM*863J27AI3 AMAZON.COM SEATTLE WA C#2629	69.26-
1/04	POS DEB 1224 12/31/20 82577389 SAFEWAY #2761 SAFEWAY 2761 LANDER WY C#2629	108.61-
1/04	DBT CRD 1310 12/31/20 DJUXCL9B SAFEWAY #2761 LANDER WY C#2629	41.96-
1/04	DBT CRD 1304 12/31/20 DJYDFXXF SAFEWAY FUEL2761	46.91-



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Primary Account Acct Ending 3668
Enclosures

PAUL D MCCOWN
10-RED RIM-RD
LANDER WY 82520

Reward Checking Acct Ending 3668 (Continued)

WITHDRAWALS		
Date	Withdrawals	Amount
1/04	LANDER WY C#2629 DBT CRD 1853 01/01/21 DJQJ62A9 DOLLARSHAVECLUBUS	10.50-
1/05	MARINA D REY CA C#2629 POS DEB 0826 12/31/20 00000087 AMAZON.COM*276H88KR3 AMAZON.COM	94.49-
1/06	SEATTLE WA C#2629 PAYMENT VENMO	1,549.00-
1/11	WEB PAYMENT VENMO	11.73-
1/15	WEB DBT CRD 2348 01/14/21 DJQHRKII OTL*SCORESENSE.COM	19.95-
1/19	800-679-6327 TX C#2629 DBT CRD 1309 01/16/21 DJBIJQC8 WENDY S #0503	56.85-
1/19	ORANGE CA C#2629 DBT CRD 1400 01/17/21 DJWDHW34 APPLE.COM/BILL 1111111111 CA C#2629	12.59-



Date 2/17/21 Page 1
Primary Account Acct Ending 3668
Enclosures

PAUL D MCCOWN
10 RED RIM RD
LANDER WY 82520

Account Title: PAUL D MCCOWN

Reward Checking		Number of Enclosures	0
Account Number	Acct Ending 3668	Statement Dates	1/21/21 thru 2/17/21
Previous Balance	322.59	Days in the statement period	28
1 Deposits/Credits	2,000.00	Average Ledger	408.52
11 Checks/Debits	1,912.00	Average Collected	408.52
Service Charge	.00	Interest Earned	.01
Interest Paid	.01	Annual Percentage Yield Earned	0.03%
Current Balance	410.60	2021 Interest Paid	.82

DEPOSITS AND ADDITIONS

Date	Deposits	Amount
2/01	Transfer from x3957 to x3668	2,000.00
2/17	Interest Deposit	.01

WITHDRAWALS

Date	Withdrawals	Amount
1/21	PAYMENT VENMO	60.00-
	WEB	
1/21	DBT CRD 1807 01/20/21 DJP3NFVQ	6.99-
	DISNEYPLUS	
	888-9057888 CA C#2629	
1/25	DBT CRD 2007 01/24/21 DJS1G9AZ	2.99-
	APPLE.COM/BILL	
	866-712-7753 CA C#2629	
1/25	DBT CRD 2007 01/24/21 DJI6K6AX	13.64-
	APPLE.COM/BILL	
	866-712-7753 CA C#2629	
1/26	PAYMENT VENMO	75.00-
	WEB	
1/27	DBT CRD 0331 01/26/21 DJYFCMV6	2.99-
	APPLE.COM/BILL	
	866-712-7753 CA C#2629	
2/01	DBT CRD 1851 02/01/21 DJQAK2BX	10.50-
	DOLLARSHAVECLUBUS	
	MARINA D REY CA C#2629	
2/02	PAYMENT VENMO	1,706.00-
	WEB	



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Primary Account Acct Ending 3668
Enclosures

PAUL D MCCOWN
10 RED RIM RD
LANDER WY 82520

Reward Checking Acct Ending 3668 (Continued)

WITHDRAWALS		
Date	withdrawals	Amount
2/16	DBT CRD 2349 02/14/21 DJXGIEAM OTL*SCORESENSE.COM 800-679-6327 TX C#2629	19.95-
2/17	DBT CRD 2054 02/16/21 DJA7ERND APPLE.COM/BILL 866-712-7753 CA C#2629	1.35-
2/17	DBT CRD 1359 02/17/21 DJR857L3 APPLE.COM/BILL 866-712-7753 CA C#2629	12.59-



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Primary Account Acct Ending 3668
Enclosures

PAUL D MCCOWN
10 RED RIM RD
LANDER WY 82520

Account Title: PAUL D MCCOWN

Reward Checking		Number of Enclosures	0
Account Number	Acct Ending 3668	Statement Dates	2/18/21 thru 3/17/21
Previous Balance	410.60	Days in the statement period	28
1 Deposits/Credits	750,000,000.00	Average Ledger	375,161,357.68
15 Checks/Debits	2,126.90	Average Collected	375,161,357.68
Service Charge	.00	Interest Earned	324,999.13
Interest Paid	324,999.13	Annual Percentage Yield Earned	1.04%
Current Balance	750,323,282.83	2021 Interest Paid	324,999.95

DEPOSITS AND ADDITIONS

Date	Deposits	Amount
3/01	Transfer from x7190 to x3668	750,000,000.00
3/17	Interest Deposit	324,999.13

WITHDRAWALS

Date	Withdrawals	Amount
2/18	PAYMENT VENMO	75.00-
	WEB	
2/19	DBT CRD 1625 02/18/21 DJLKPNI5	9.03-
	LOAF N JUG #0155	
	LANDER WY C#2629	
2/22	DBT CRD 1743 02/18/21 DJYHRMI6	69.43-
	SAFEWAY #2761	
	LANDER WY C#2629	
2/22	DBT CRD 1817 02/20/21 DJJUBJOU	6.99-
	DISNEYPLUS	
	888-9057888 CA C#2629	
2/23	DBT CRD 1913 02/23/21 DJLS27B5	8.39-
	APPLE.COM/BILL	
	866-712-7753 CA C#2629	
2/23	DBT CRD 0628 02/23/21 DJQDXM18	31.49-
	APPLE.COM/BILL	
	866-712-7753 CA C#2629	
2/24	DBT CRD 2202 02/22/21 DJIILZ4W	9.03-
	LOAF N JUG #0155	
	LANDER WY C#2629	
2/24	DBT CRD 1743 02/22/21 DJVQY44S	118.79-
	SAFEWAY #2761	



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Primary Account Acct Ending 3668
Enclosures

PAUL D MCCOWN
10 RED RIM RD
LANDER WY 82520

Reward Checking

Acct Ending 3668 (Continued)

WITHDRAWALS		
Date	Withdrawals	Amount
2/24	LANDER WY C#2629 DBT CRD 2007 02/24/21 DJGIAIQ9 APPLE.COM/BILL 866-712-7753 CA C#2629	2.99-
2/24	DBT CRD 2007 02/24/21 DJJLECQU APPLE.COM/BILL 866-712-7753 CA C#2629	13.64-
3/01	DBT CRD 0327 02/26/21 DJHFNJHP APPLE.COM/BILL 866-712-7753 CA C#2629	2.99-
3/01	DBT CRD 1859 03/01/21 DJX25DTG DOLLARSHAVECLUBUS MARINA D REY CA C#2629	10.50-
3/05	PAYMENT VENMO WEB	1,718.00-
3/15	POS DEB 1244 03/14/21 008YAH8V AMAZON PAYMENTS AMAZON PAYMENTS SEATTLE WA C#2629	37.00-
3/17	DBT CRD 1506 03/17/21 DJLNKTN8 APPLE.COM/BILL 866-712-7753 CA C#2629	13.63-

Exhibit B



To whom it may concern,

The purpose of this document is an attestation of the account balance of Paul McCown's personal bank account, ending in -3668. As of today, May 7, 2021, the account balance is \$761,481,265.21.

I affirm this balance in my capacity as an officer of the bank, its Corporate Vice President and Branch President.

Sincerely,

A handwritten signature in black ink, appearing to read "K. S. Hayford".

Kendall S. Hayford
VP Branch President



To whom it may concern,

The purpose of this document is an attestation of the account balance of Paul McCown's personal bank account, ending in [REDACTED] 3668. As of today, May 11, 2021, the account balance is \$761,481,265.21.

I affirm this balance in my capacity as an officer of the bank, its Corporate Vice President and Branch President.

Sincerely,

A handwritten signature in black ink, appearing to read "K.S. Hayford". The signature is stylized with a large "K" and a long horizontal stroke at the end.

Kendall S. Hayford
VP Branch President